

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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RON L. BEAULIEU & CO., INC. AND RON L.  
BEAULIEU, INDIVIDUALLY, TRI-COUNTY  
COMMUNITY ACTION PROGRAM, INC. AS  
ASSIGNEE OF RON L. BEAULIEU & CO., INC. AND  
RON L. BEAULIEU, INDIVIDUALLY,

Plaintiffs,

Docket No.

v.

PHILADELPHIA INSURANCE COMPANY,  
PHILADELPHIA INDEMNITY INSURANCE  
COMPANY AND PHILADELPHIA  
CONSOLIDATED HOLDING CORP.,

Defendants.

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**NOTICE TO REMOVE FROM STATE COURT**

Philadelphia Insurance Company, Philadelphia Indemnity Insurance Company and Philadelphia Consolidated Holding, Corp., (collectively “Defendants”) hereby remove this matter from Coos County Superior Court (Docket No.: 214-2017-cv-65) to the United States District Court for the District of New Hampshire pursuant to 28 U.S.C. § 1441 (a, b) (Diversity of Citizenship 28 U.S.C. § 1332) and 28 U.S.C. § 1446 (procedure for removal) and say:

1. Plaintiff commenced a state court action entitled Ron L. Beaulieu & Co., Inc., et al v Philadelphia Insurance Company, et al., Coos County Superior Court Docket No.: 214-2017-cv-65, dated June 26, 2017. A true and correct copy of the state court complaint is attached hereto as Exhibit A.

2. This civil action is removable under 28 U.S.C. § 1441 (a) which provides, in pertinent part, "...any civil action brought in a state court of which the district courts of the United States have original jurisdiction, may be removed..."

3. This is an action by a New Hampshire plaintiff against out of state defendants, with the amount in controversy likely to exceed \$75,000. 28 U.S.C. § 1332 (a), (c).

4. The United States District Court for the District of New Hampshire has proper subject matter jurisdiction and venue over this action. See 28 U.S.C. § 1441 (a).

5. The time for removal of this action has not expired.

6. A copy of this notice of removal is being sent to plaintiffs and the Coos County Superior Court. See Exhibits B and C.

7. A Civil Coversheet is filed herewith.

Respectfully submitted,

Philadelphia Insurance Company, Philadelphia  
Indemnity Insurance Company and Philadelphia  
Consolidated Holding Corp.

MORRISON MAHONEY LLP

August 15, 2017

/s/ *Linda M. Smith*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on the following persons on this date in the manner specified herein:

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/s/ Linda M. Smith  
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Linda M. Smith, #265038